

EXHIBIT 7

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE APACHE CORP. SECURITIES
LITIGATION

Case No. 4:21-cv-00575

District Judge George C. Hanks, Jr.

Magistrate Judge Andrew M. Edison

CLASS ACTION

**DECLARATION OF DOUGLAS A. DANIELS ON BEHALF OF
DANIELS & TREDENNICK PLLC IN SUPPORT OF LEAD COUNSEL'S
MOTION FOR ATTORNEYS' FEES AND LITIGATION EXPENSES**

I, Douglas A. Daniels, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a partner of the law firm of Daniels & Tredennick PLLC (“Daniels & Tredennick”). I submit this declaration in support of Lead Counsel’s motion for an award of attorneys’ fees in connection with services rendered by Plaintiffs’ Counsel in the above-captioned securities class action (“Action”), as well as for payment of Litigation Expenses incurred in connection with the Action.¹ Unless otherwise stated, I have personal knowledge of the facts set forth herein and, if called upon, could and would testify thereto.

2. My firm served as additional Plaintiffs’ Counsel in the Action. In this capacity, my firm incorporated its independent investigation into the underlying facts of the claim to assist in (1) discovery-related matters, in particular strategic decisions related to resolution of outstanding discovery disputes, (2) preparation for and participation in the

¹ All capitalized terms that are not otherwise defined herein shall have the meanings set forth in the Stipulation and Agreement of Settlement dated May 7, 2024. Dkt. 162-2.

hearing on Plaintiffs' Motion for Class Certification, including advice and counsel regarding arguments made and facts and points emphasized in advocating for the Court to approve the proposed class, and (3) assisting in preparations for fact witness depositions.

3. Based on my work in the Action, as well as the review of time records reflecting work performed by other attorneys and professional support staff employees at Daniels & Tredennick in the Action ("Timekeepers"), as reported by the Timekeepers, I directed the preparation of the table set forth as Exhibit A hereto. The table in Exhibit A: (i) identifies the names and employment positions (i.e., titles) of the Timekeepers who devoted ten (10) or more hours to the Action; (ii) provides the number of hours that each Timekeeper expended in connection with work on the Action, from the time when potential claims were being investigated through July 30, 2024; (iii) provides each Timekeeper's current hourly rate unless otherwise noted; and (iv) provides the lodestar of each Timekeeper and the entire firm. For Timekeepers who are no longer employed by Daniels & Tredennick, the hourly rate used is the hourly rate for such employee in his or her final year of employment by my firm. The table in Exhibit A was prepared from daily time records regularly prepared and maintained by my firm in the ordinary course of business, which are available at the request of the Court. All time expended in preparing this application for attorneys' fees and expenses has been excluded.

4. The number of hours expended by Daniels & Tredennick in the Action, from inception through July 30, 2024, as reflected in Exhibit A, is 42.50. The lodestar for my firm, as reflected in Exhibit A, is \$27,625.00, consisting of \$27,625.00 for attorneys' time and \$0 for professional support staff time.

5. The hourly rates for the Timekeepers, as set forth in Exhibit A, are their standard rates. My firm's hourly rates are largely based upon a combination of the title, the specific years of experience for each attorney and professional support staff employee, as well as market rates for practitioners in the field. These hourly rates are the same as, or comparable to, rates submitted by Daniels & Tredennick and accepted by courts in other complex contingent class actions for purposes of "cross-checking" lodestar against a proposed fee based on the percentage-of-the-fund method, as well as determining a reasonable fee under the lodestar method.

6. I believe that the number of hours expended and the services performed by the attorneys and professional support staff employees at Daniels & Tredennick were reasonable and necessary for the effective and efficient prosecution and resolution of the Action.

7. Expense items are reported separately and are not duplicated in my firm's hourly rates. As set forth in Exhibit B hereto, Daniels & Tredennick is seeking payment for \$0 in expenses incurred in connection with the prosecution and resolution of the Action. In my judgment, these expenses were reasonable and expended for the benefit of the Settlement Class in this Action.

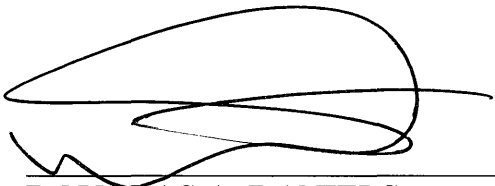
8. The expenses incurred by Daniels & Tredennick in the Action would be reflected on the books and records of my firm. These books and records are prepared from expense vouchers, check records, and other source materials and are an accurate record of the expenses incurred. A search and review of those books and records confirm that Daniels

& Tredennick incurred no reimbursable expenses in connection with its work in this Action..

9. With respect to the standing of my firm, attached hereto as Exhibit C is a firm résumé, which includes information about my firm and biographical information concerning the firm's attorneys.

I declare, under penalty of perjury, that the foregoing facts are true and correct.

Executed on July 30, 2024.



DOUGLAS A. DANIELS

EXHIBIT A

In re Apache Corp. Securities Litigation
Case No. 4:21-cv-00575 (S.D. Tex.)

DANIELS & TREDENNICK PLLC

TIME REPORT

From Inception Through July 30, 2024

NAME	CURRENT HOURLY RATE	HOURS	LODESTAR
Partners			
Douglas A. Daniels	\$650	42.50	\$ 27,625.00
TOTALS		42.50	\$ 27,625.00

EXHIBIT B

In re Apache Corp. Securities Litigation
Case No. 4:21-cv-00575 (S.D. Tex.)

DANIELS & TREDENNICK PLLC
EXPENSE REPORT

CATEGORY	AMOUNT
None	-
TOTAL EXPENSES:	\$0

EXHIBIT C

In re Apache Corp. Securities Litigation
Case No. 4:21-cv-00575 (S.D. Tex.)

DANIELS & TREDENNICK PLLC
FIRM RESUME



DANIELS & TREDENNICK PLLC
— ATTORNEYS AT LAW —

SUMMARY RESUME

Detailed information regarding Daniels & Tredennick, PLLC (“Daniels & Tredennick” or “DT”) may be found on the firm’s website: www.dtlawyers.com. The firm’s website contains a wide variety of information, including highlights of current and previous successes and biographies of each attorney.

Daniels & Tredennick is a trial firm in Houston, Texas. Our attorneys come from a variety of backgrounds, primarily from large law firms and appellate courts. We have over 30 attorneys focusing on complex commercial litigation in multiple practice areas, including oil and gas, insurance, and financial fraud.

Lawyers from Daniels & Tredennick have been part of many MDLs and other mass actions, including:

Actos

Attorneys at the firm, led by partner Doug Daniels, argued multiple discovery motions and deposed corporate representatives in this action alleging that the anti-diabetic medication played a role in the development of bladder cancer. The lawsuits accused the manufacturer, Takeda Pharmaceutical Company, of hiding the relationship between the drug and the cancer from patients and healthcare providers. Doug served as a member of the Discovery Subcommittee of the Plaintiffs’ Steering Committee and DT attorneys assisted in compiling and reviewing medical records and resolving claims for hundreds of plaintiffs in this MDL.

Transvaginal Mesh (Bard and Boston Scientific)

Doug Daniels served as counsel to bellwether plaintiffs, taking and defending numerous depositions in cooperation with Plaintiffs’ Steering Committee in MDL No. 2187, *In Re C. R. Bard, Inc.*, Pelvic Repair System Products Liability Litigation. These lawsuits alleged that transvaginal mesh caused complications including pain, bleeding, infection, organ perforation and autoimmune problems.

Transvaginal Mesh (Ethicon)

In MDL No. 2327, *In Re Ethicon, Inc.*, another Pelvic Repair System Products Liability Litigation, Doug Daniels negotiated and administered the settlement of a docket of approximately 75 claimants with settlement counsel for defendant, including implementation of notice and consent requirements and documentation in support of claims, appeals, and applications for holdback funds.

Covid Business Interruption

Doug Daniels served as plaintiff's counsel in MDL No. 2942, *In Re Covid-19*, Business Interruption Protection Insurance Litigation, representing companies throughout the country, including restaurants, professional sports teams, and franchises, assisting in their recovery of losses resulting from business shutdown due to Covid-19.

Depakote Birth Defects

Lawyers at the firm handled hundred of plaintiffs' claims with regards to Depakote, an epilepsy medication. This action alleged that Abbott and its successor AbbVie did not adequately warn women of the risk of serious birth defects associated with Depakote, which was linked to a four-fold higher rate of major fetal malformations in pregnant women than with the use of other epilepsy medications.

Bard IVC Filters

Doug Daniels represented plaintiff Eli Greenbaum in No. MDL No. 15-02641, *In re Bard IVC Filters* Products Liability Litigation. These lawsuits alleged C.R. Bard and Cook Medical's devices were defective, making them more likely to fracture or perforate the inferior vena cava.

Below is biographical information of the Daniels & Tredennick attorneys who have been involved in various MDL and mass actions matters:

Doug Daniels

Doug Daniels, Partner, is a trial lawyer with more than two decades of experience advocating for clients in the courtroom. He is a native Texan but has represented clients from all fifty states. He has appeared in courtrooms across the country and handled cases as a lead advocate in over a dozen states and six foreign countries. After graduating from Duke University and the University of Texas School of Law, Doug was a partner in a large Houston law firm representing both corporate and individual clients. He co-founded Daniels & Gentle, LLP in 2012 to focus on representing victims and aggrieved parties in civil disputes. In 2015, he became a partner at Daniels & Tredennick, LLP. Doug has handled hundreds of commercial disputes, both large and small, in a variety of business settings, including oilfield services, real estate finance and development,

residential and industrial construction, banking and finance, insurance coverage disputes, judgment collection efforts, and ERISA claims, to name only a few. Mr. Daniels' philosophy is that a trial lawyer is always "in trial," meaning every aspect of the case should be prepared and handled as if a judge and jury are present and looking on. He believes the two most important attributes of any successful trial lawyer are courage and credibility.

Sabrina Tour

Sabrina Tour, Partner, is a commercial litigator with trial and arbitration experience. She has tried cases both to the bench and to the jury, and has participated in arbitrations in the US and abroad. She has handled all aspects of litigation, including pre-suit investigation, discovery, motions, trials, and appeals. Sabrina assisted in compiling and reviewing medical records, and resolving claims for a few hundred plaintiffs in the Actos MDL. Sabrina's practice focuses primarily on commercial litigation, oil and gas, and sports law. Sabrina attended Rice University where she graduated with a B.A. in Political Science and Sport Management in May 2009. After graduation, she taught for two years at Yellowstone Academy, a school for underprivileged children in inner-city Houston. Sabrina graduated from Vanderbilt University Law School in May 2014. Sabrina previously held the position of General Counsel of a top 5 national sports agency which represents NFL players and NFL and college coaches and team executives.



HOUSTON TRIAL &
APPELLATE ATTORNEYS

Doug Daniels, Partner

B.A., Duke University, *Cum Laude*

J.D., University of Texas School of Law, *Texas Law Review*, *Order of the Coif*

Awards: Texas Super Lawyer (Multiple Years); Rising Star (Multiple Years)

Large Firm Experience: Bracewell, LLP

Ted Tredennick, Partner

B.A., Emory University, *Phi Beta Kappa*

M.Ed., University of Houston

J.D., University of Houston Law Center

Awards: Houstonia Top Lawyers (Multiple Years)

Judicial Experience: The Honorable Lynn N. Hughes, United States District Court for the Southern District of Texas

Max Beatty, Partner

B.B.A., University of Texas at Austin, *Highest Honors*

M.A., University of Texas at Austin, *Highest Honors*

J.D., Texas Tech School of Law, *Summa Cum Laude*, *Order of the Coif*

Awards: Texas Super Lawyer (Multiple Years); Rising Star (Multiple Years)

Chris Diamond, Partner

B.A., Texas A&M University, Distinguished Student Award

J.D., South Texas College of Law, *Cum Laude*

Awards: Houstonia Top Lawyers (Multiple Years)

Gene Egdorf, Partner

B.A., University of Texas with *Honors*

J.D., University of Texas with *Honors*, *Order of the Coif*

Awards: Super Lawyers, Rising Star (Multiple Years)

Large Firm Experience: Weil, Gotshal & Manges LLP; The Lanier Law Firm

Jim Hawkins, Partner

B.A., Baylor University, *Magna Cum Laude*

J.D., University of Texas School of Law, *Highest Honors*, *Grand Chancellor*, *Texas Law Review*

Appellate Experience: United States Court of Appeals for the Fifth Circuit, Law Clerk to The Honorable Jerry E. Smith

Large Firm Experience: Fulbright & Jaworski

Previously, Professor at the University of Houston Law Center



HOUSTON TRIAL &
APPELLATE ATTORNEYS

Laura Herring, Partner

B.B.A., University of Texas

M.B.A., University of Houston

J.D., University of Houston Law Center

Awards: Texas Super Lawyer (multiple years)

Large Firm Experience: Bracewell, LLP

Jordan Howes, Partner

B.S., Fontbonne University School of Business

M.P.P., Pepperdine University School of Public Policy

J.D., Tulane University Law School

Large Firm Experience: Doyle, Restrepo, Harvin, & Robbins, LLP

Andrea Kim, Partner

B.B.A., University of Texas, *Accounting and Business Honors Program*

J.D./M.B.A., University of Texas, *Sord Scholar 4.0 Deans Award, Highest Honors*

Certified Fraud Examiner

Awards: Texas Super Lawyer

Large Firm Experience: Hughes & Luce (now K&L Gates); Diamond McCarthy, LLP

John Luman, Partner

B.S., George Washington University

M.S., University of Texas

J.D., Syracuse University College of Law, *Syracuse Law Review*

Awards: Woodward White, Inc.'s The Best Lawyers in America (Multiple Years), Houstonia Top Lawyers (Multiple Years), Texas Super Lawyer

Large Firm Experience: Akin Gump, LLP; Bracewell, LLP

Heath Novosad, Partner

B.B.A., University of Texas, *Marketing and Business Honors Program*

J.D., University of Texas School of Law

Awards: 2007 Rising Star, 2023 Texas Super Lawyer

Large Firm Experience: Bracewell, LLP



HOUSTON TRIAL &
APPELLATE ATTORNEYS

Jill Schumacher, Partner

Board Certified in Civil Appellate Law, Texas Board of Legal Specialization

B.S., Washington University, *Summa Cum Laude*

J.D., Duke University School of Law, *Cum laude*

Awards: Courageous Defender of Life Award, Texas Right to Life (2020), Houstonia Top Lawyers (Multiple Years), Rising Star (2022), Woodrow B. Seals Outstanding Young Lawyer of Houston, HYL A (2022), Outstanding Young Lawyer of Texas, Texas Lawyers Association (2022), Stephen G. Condos Award for Outstanding New Member, Texas Bar College (2023)

Appellate Experience: Fourteenth Court of Appeals of Texas, Chief Justice Kem Thompson Frost; Nebraska Court of Appeals, Judge Francie Riedmann; United States District Court for the District of Nebraska, Richard G. Kopf

Will Stafford, Partner

B.S., Tulane University

M.A., Tulane University

J.D., University of Pennsylvania Law School

Large Firm Experience: Haynes and Boone, LLP

Previously, General Counsel and Chief Compliance Officer at NextSeed

Sabrina Tour, Partner

B.A., Rice University, *President's Honor Roll*

J.D., Vanderbilt University Law School, *Dean's List*

Judicial Experience: The Honorable Ewing Werlein, Jr., United States District Court for the Southern District of Texas



HOUSTON TRIAL &
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B.A., Baylor University, *Beta Gamma Sigma*
J.D., Baylor University School of Law, *Order of Barristers*
Chief Operating Officer – The Brookwood Community, Inc.
Vice President & General Counsel – Vision Source

Courtney Hawkins, Of Counsel

B.A., Louisiana Scholars' College of Northwestern State University, *with Distinction*
M.A., Baylor University
J.D., University of Texas School of Law, *Highest Honors, Clerk of Chancellors, Order of the Coif, Texas Law Review*
Large Firm Experience: King & Spalding, LLP

Kristin Kruse Lotz, Of Counsel

B.A., Texas A&M University, *Magna Cum Laude*
J.D., Southern Methodist University, *SMU Law Review, SMU Barristers*
Appellate Experience: Briefing Attorney to Justice Charles W. Seymore, Fourteenth Court of Appeals of Texas; Intern to Chief Justice Nathan L. Hecht, Texas Supreme Court
Judicial Experience: Intern to Judge Lynn N. Hughes, United States District Court for the Southern District of Texas
Awards: Texas Super Lawyer (Multiple Years); Rising Star (Multiple Years); 2015 Outstanding Young Lawyer of Houston (awarded by Houston Young Lawyers Association)
Large Firm Experience: Winstead, PC

Ellen Peebles, Of Counsel

B.A., University of Texas, *Phi Beta Kappa*
J.D., Southern Methodist University, *Order of the Coif, SMU Law Review, SMU Barristers*
Appellate Experience: Chambers Staff Attorney for the First Court of Appeals of Texas; Law Clerk to the Honorable Dale Wainwright, Supreme Court of Texas
Large Firm Experience: Locke Lord, LLP

Megan Reinkemeyer, Of Counsel

B.A., Centenary College of Louisiana, *Cum Laude*
J.D./D.C.L., Louisiana State University, Paul M. Hebert Law Center, *Magna Cum Laude, Order of the Coif*
Appellate Experience: Staff Attorney, Fourteenth Court of Appeals, State of Texas

Kelsey Smith, Of Counsel

B.S., University of Kansas
J.D., South Texas College of Law, *Magna Cum Laude*
Judicial Experience: Clerk for First Court of Appeals of Texas, The Honorable Jim Sharp



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B.B.A., Wichita State University
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United States Air Force
Malone Bailey, LLP

Mary Rodman Crawford, Associate

B.S., The University of Texas
J.D., South Texas College of Law, *Cum Laude*
Judicial Experience: U.S. District Court for the Southern District of Texas,
The Honorable Frances Stacy

William Haacker, Associate

B.S., University of Houston
J.D., South Texas College of Law

Carter Nash, Associate

B.A., University of Texas
M.A., University of Texas
J.D., University of Houston Law Center with *Honors, Houston Law Review, Dean's List*
Judicial Experience: U.S. District Court for the Southern District of Texas,
Honorable Frances H. Stacy

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B.A., Texas A&M University, *Summa Cum Laude*
B.B.A., Texas A&M University, *Summa Cum Laude*
J.D., University of Virginia School of Law, *Virginia Tax Review, Articles Review Editor*
Large Firm Experience: Bradley Arant Boult Cummings LLP